Rule 19. Discovery.

- Within 10 days after service of the notice of formal hearing the commission and the respondent shall exchange the following material and information within their possession or control:
 - (a) The names and addresses of persons who have knowledge of facts relating to the complaint against the respondent;
 - (b) Any written or recorded statements made by these persons and the substance of any oral statements claimed to have been made by the respondent;
 - (c) Any reports or statements of experts, made in connection with the particular case, including results of physical or mental examinations; and
 - (d) Any books, papers, documents, photographs or tangible objects pertaining to the case.
- The commission's and respondent's obligation under this rule extends to material and information in the possession or control of any persons who, on behalf of the commission or the respondent, have participated in any investigation of the charges.
- If, subsequent to complying with these discovery provisions, the commission or respondent discovers additional material or information which is subject to disclosure, the additional material or information must be promptly disclosed.
- 4. True work product of counsel is not subject to discovery.